

**STATEMENT OF BASIS (AI No. 19881)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0005215 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Cargo Carriers  
Division of Cargill Marine & Terminal, Inc.  
Post Office Box 109  
Port Allen, Louisiana 70767

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** July 27, 2009

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of an Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. LPDES permits – LA0005215**  
LPDES permit effective date: October 1, 2003  
LPDES permit expiration date: September 30, 2008  
LPDES modification date: June 1, 2005

**C. Date Application Received:** May 1, 2009

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - barge fleeting and switching facility**

Cargo Carriers is an existing barge fleeting and switching facility. The facility currently discharges sanitary wastewater and ballast water. The incoming ballast water and void water outfall is being left in the permit at the request of the facility.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 4499

**C. LOCATION -** Right descending bank of the Mississippi River at approximate River Mile 228, Port Allen, West Baton Rouge Parish (Latitude 30° 25' 22", Longitude 91° 12' 13")

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### 3. OUTFALL INFORMATION

#### Outfall 002

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant  
Location: at the point of discharge from the Cromaglass Wastewater Treatment System  
Flow: 350 gpd  
Discharge Route: Mississippi River

#### Outfall 005

Discharge Type: incoming ballast water and void water  
Treatment: none  
Location: at the point of discharge from the vessel prior to combining with other waters  
Flow: intermittent  
Discharge Route: Mississippi River

#### Outfall 006

Discharge Type: facility ballast water, dry dock ballast water, and void water  
Treatment: none  
Location: at the point of discharge from the vessel/dry dock prior to combining with other waters  
Flow: intermittent  
Discharge Route: Mississippi River

### 4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. drinking water supply

### 5. TMDL STATUS

The discharges from Cargo Carriers are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

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## 6. CHANGES FROM PREVIOUS PERMIT

- Outfall 002A has been renamed Outfall 002 to be consistent with current permitting practices.
- Outfall 005A has been renamed Outfall 005 to be consistent with current permitting practices, and the outfall description has been changed from "incoming ballast water from void tanks on customer barges" to "incoming ballast water and void water".
- Outfall 005B has been renamed Outfall 006 to be consistent with current permitting practices, and the outfall description has been changed from "maintenance ballast water from void tanks on customer barges" to "facility ballast water, dry dock ballast water, and void water".
- The SIC code has been changed from 4463 to 4499 to better reflect current activities.
- The limits for Outfall 002 have been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit, and all parameters have been changed to daily max limitations.
- Stormwater Pollution Prevention Plan language is being replaced with BMP language in Part II as all operations occur over water.

## 7. COMPLIANCE HISTORY/COMMENTS

There have been no recent inspections at the facility.

DMR's have been submitted in accordance with the current permit with the exception of April-August 2008. The facility did not have any activity during these months and did not realize that DMR's needed to be submitted. They were notified that DMR's should have been sent it for this time. They are compiling them and will submit the missing DMR's to the Office of Environmental Compliance. Only one excursion was found for Fecal Coliform (6/07 - 580 col/100mL).

## 8. EXISTING EFFLUENT LIMITS

Outfall 002A – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	Report 1/6 months Est.	Report 1/6 months Est.
BOD <sub>5</sub>	---	45 mg/L 1/6 months Grab
TSS	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	400 col./100mL 1/6 months Grab
pH	6.0-9.0 s.u. 1/6 months	

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Outfall 005A – incoming ballast water from void tanks on customer barges

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/week Est.	Report 1/week Est.
Oil & Grease	---	15 mg/L 1/week Grab
COD	---	250 mg/L 1/week Grab
pH	6.0-9.0 s.u. 1/week Grab	

Outfall 005B – maintenance ballast water from void tanks on customer barges\*

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/month Est.	Report 1/month Est.
Oil & Grease	---	15 mg/L 1/month Grab
COD	---	250 mg/L 1/month Grab
pH	6.0-9.0 s.u. 1/month Grab	

\*Sampling only required if a visible sheen is present.

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and

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maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

#### **10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

#### **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Cargo Carriers

#### 1. Outfall 002: treated sanitary wastewater

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
BOD <sub>5</sub>	30	45	BPJ; LAG530000 and similar discharges
TSS	30	45	BPJ; LAG530000 and similar discharges
Fecal Coliform colonies/100ml	200	400	BPJ; LAG530000 and similar discharges
pH, s.u.	6.0 (min)	9.0 (max)	BPJ; LAG530000 and similar discharges

**Treatment:** sewage treatment plant

**Monitoring Frequency:** 1/6 months for all parameters at the point of discharge from the Cromaglass Wastewater Treatment System prior to combining with other waters.

**Limits Justification:** BPJ; per the Class I Sanitary Discharge General Permit (LAG530000), Schedule B, Treated Sanitary Wastewater less than 5000 GPD and similar discharges.

#### 2. Outfall 005: incoming ballast water and void water

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	---	250	Similar discharges (BPJ)
Oil & Grease	---	15	Similar discharges (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges (BPJ)

**Treatment:** none

**Monitoring Frequency:** Flow, COD, Oil & Grease and pH shall be observed once per week at the point of discharge from the vessel prior to combining with other waters.

**Limits Justification:** Limits and Monitoring Frequency are based on current guidance for similar discharges from other industrial facilities.

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3. **Outfall 006:** facility ballast water, dry dock ballast water, and void water.

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow <sup>1</sup>	Report	Report	
COD <sup>1</sup>	---	250	Similar discharges (BPJ)
Oil & Grease <sup>1</sup>	---	15	Similar discharges (BPJ)
Visual Sheen <sup>2</sup>	---	No presence	Similar discharges (BPJ)
pH, s.u. <sup>1</sup>	6.0 (min)	9.0 (max)	Similar discharges (BPJ)

**Treatment:** none

**Monitoring Frequency:** 1/day for Visual Sheen. Flow, COD, Oil & Grease and pH shall be observed once per event at the point of discharge from the vessel prior to combining with other waters.

**Limits Justification:** Limits and Monitoring Frequency are based on current guidance for similar discharges from other industrial facilities.

<sup>1</sup> Discharge shall be sampled whenever there is a presence of a visible sheen.

<sup>2</sup> When discharging.

BPJ Best Professional Judgment  
 s.u. Standard Units

Storm Water Pollution Prevention Plan (SWP3) Requirement

As per LAC33:IX.2511.B.14.k, stormwater discharges from facilities classified as SIC Codes 4499 are considered to be associated with industrial activities and accordingly require SWP3 requirements. However, an SWP3 is not included in the permit because the facility is a water related operation only. Barge BMPs are comparable to the SWP3 requirements; therefore, the barge BMPs will be applied instead.